

**UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Veronica E. Hughes aka Veronica Elisa
Hughes aka Veronica Hughes
Debtor(s)
LoanCare, LLC, or its Successor or Assignee
Movant
vs.

Veronica E. Hughes aka Veronica Elisa Hughes
aka Veronica Hughes
Charles J DeHart, III (Trustee)
Respondent(s)

Chapter 13

Bankruptcy No. 17-bk-00824-RNO

**LOANCARE, LLC NOTICE OF DEBTOR'S REQUEST FOR FORBEARANCE
DUE TO THE COVID-19 PANDEMIC**

Now comes Creditor LoanCare, LLC ("Creditor"), by and through undersigned counsel, and hereby submits Notice to the Court of the Debtor's request for mortgage payment forbearance based upon a material financial hardship caused by the COVID-19 pandemic.

The Debtor recently contacted Creditor requesting a forbearance period of 12 months and has elected to not tender mortgage payments to Creditor that would come due on the mortgage starting 10/01/20 through 09/01/21. Creditor holds a secured interest in real property commonly known as 187 Wilderness Acres, Stroudsburg, Pennsylvania 18301 as evidenced by claim number 7 on the Court's claim register. Creditor, at this time, does not waive any rights to collect the payments that come due during the forbearance period. If the Debtor desires to modify the length of the forbearance period or make arrangements to care for the forbearance period arrears, Creditor asks that the Debtor or Counsel for the Debtor make those requests through undersigned counsel.

Per the request, Debtor will resume Mortgage payments beginning 10/01/21 and will be required to cure the delinquency created by the forbearance period (hereinafter "forbearance arrears"). Creditor has retained undersigned counsel to seek an agreement with Debtor regarding the

cure of the forbearance arrears and submit that agreement to the Court for approval. If Debtor fails to make arrangements to fully cure the forbearance arrears, Creditor reserves its rights to seek relief from the automatic stay upon expiration of the forbearance period.

/s/ Ann E. Swartz, Esquire

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